

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, et al.,

Plaintiffs,

v.

JETBLUE AIRWAYS CORPORATION and
SPIRIT AIRLINES, INC.,

Defendants.

Civil Action No. 1:23-cv-10511-WGY

**DECLARATION OF ELIZABETH M. WRIGHT IN SUPPORT OF DEFENDANTS’
MOTION *IN LIMINE* TO EXCLUDE OPINIONS OF DR. TASNEEM CHIPTY**

I, Elizabeth M. Wright, declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney admitted to practice before this Court and Special Counsel at the law firm of Cooley LLP, counsel of record for Defendant JetBlue Airways Corporation (“JetBlue”) in this action. I make this declaration of my own personal knowledge and, if called to do so, could testify competently to the facts stated herein under oath. I submit this Declaration support of Defendants’ Motion *in Limine* to Exclude Opinions of Dr. Tasneem Chipty.

2. Attached as Exhibit 1 is a true and correct copy of excerpts of the Amended Expert Report of Tasneem Chipty, Ph.D., dated July 6, 2023 (as amended July 31, 2023). Exhibit 1 is subject to the Joint Motion to Impound filed by the parties on September 11, 2023. The parties are working to prepare a redacted version of the exhibit, which can be filed publicly if the Court grants the Joint Motion to Impound.

3. Attached as Exhibit 2 is a true and correct copy of excerpts of the Reply Report of Tasneem Chipty, Ph.D., dated August 25, 2023. Exhibit 2 is subject to the Joint Motion to

Impound filed by the parties on September 11, 2023. The parties are working to prepare a redacted version of the exhibit, which can be filed publicly if the Court grants the Joint Motion to Impound.

4. Attached as Exhibit 3 is a true and correct copy of excerpts of the Deposition Transcript of Tasneem Chipty, deposed August 31, 2023.

5. Attached as Exhibit 4 is a true and correct copy of excerpts of the Amended Expert Report of Gautam Gowrisankaran, Ph.D., dated July 7, 2023. Exhibit 4 is subject to the Joint Motion to Impound filed by the parties on September 11, 2023. The parties are working to prepare a redacted version of the exhibit, which can be filed publicly if the Court grants the Joint Motion to Impound.

Dated: September 11, 2023

Respectfully submitted,

/s/ Elizabeth M. Wright

Elizabeth M. Wright (MA BBO #569387)

COOLEY LLP

500 Boylston Street

Boston, MA 02116

Phone (617) 937-2300

Fax (617) 937-2400

ewright@cooley.com

Attorney for Defendant

JetBlue Airways Corporation

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system on September 11, 2023, and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Elizabeth M. Wright
Elizabeth M. Wright